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SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

Coordination Proceeding
Special Title (Rule 1550(b))

ANTELOPE VALLEY GROUNDWATER
CASES

RICHARD A. WOOD, an individual, on
behalf of himself and all others similarly
situated,

Plaintiff,

v.

LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40; et
al.

Defendants.

Judicial Council Coordination
Proceeding No. 4408

(Honorable Jack Komar)

Case No.: BC 391869

**DECLARATION OF RICHARD A.
WOOD IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF
CLASS SETTLEMENT**

Date: August 3, 2015
Time: 10:00 a.m.
Room: 222

1 **DECLARATION OF RICHARD A. WOOD**

2

3 I, Richard A. Wood, declare:

4 1. I make this declaration of my own personal knowledge, except where

5 stated on information and belief, and if called to testify in Court on these matters,

6 I could do so competently.

7 2. I am the Court-appointed class representative and the Plaintiff in

8 this action. I make this declaration in support of the joint motion for preliminary

9 approval of the settlement agreement.

10 3. *Hours.* Over the past seven years, I have spent approximately 2200

11 hours in my role as Plaintiff and class representative. The following estimates are

12 conservative, and I have rounded down wherever necessary.

13 a. *Court Hearings.* I have attended Court on this matter on

14 more than 50 days, with an average door to door round trip travel time of

15 at least eight hours, for a total of 400 hours.

16 b. *Courtcall.* I have attended 53 telephonic appearances, which

17 vary widely in length, but on average have been at least 45 minutes in length. The

18 total here is 39.75 hours.

19 c. *Mediation with Justice Robie.* I spent 48 hours driving to

20 Sacramento four round trips for mediation sessions covering seven days. Those

21 mediation sessions covered 42 hours of my time. The total here is 90 hours.

22 d. *General Lawsuit Work Time.* I have spent an average of five

23 hours per week on a variety of case-related activities, including: reviewing case

24 filings on line; phone calls with my attorneys, small pumper class members, or

25 other parties; emailing with my attorneys and reviewing documents; attending at

26 least twenty mediation sessions, including those with Mr. Dendy, Mr. Waldo and

27 later mediation sessions; attending local town hall and other non-mediation

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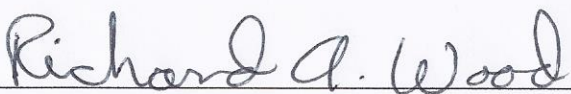
1 meetings about this lawsuit; preparing and providing relevant information for my
2 attorneys. This five hour per week estimate is likely a bit low, as there have been
3 many weeks where that number has been much higher, sometimes in excess of
4 twenty or more hours. Rounding down to just over six years, the total estimate of
5 my time on this lawsuit is at least 1700 hours.

6 4. My total out of pocket costs are approximately \$7,657. Again, this
7 number is conservative, as I round down to the nearest dollar. For example, in
8 2008 and 2009 the CourtCall fee was \$15.70, but I have used \$15 in my
9 accounting. I have driven 7040 miles on this case. At 30 miles per gallon, and
10 using a conservative price of \$3.00 per gallon, I estimate my fuel costs at \$704.

11 5. The 53 CourtCall appearances have cost me \$4154, plus another
12 \$1,051 in filing fees. During my four trips to Sacramento for the Robie meetings,
13 I incurred \$1,479 for hotel costs, plus actual fuel costs of \$270 (not included
14 above).

15 6. I am agreeable to accept the right to pump an additional two acre-
16 feet of groundwater for use on my property, free of assessment, in lieu of the
17 traditional monetary incentive payment if the Court feels that is appropriate.

18
19 I declare under penalty of perjury under the laws of the State of California
20 that the foregoing is true and correct. Executed this 9th day of July 2015, at Los
21 Angeles, California.

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25 Richard A. Wood
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